

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

**Case No.: 1:22-cv-00342-LCB-JLW**

MATTHEW FREETAGE,

Plaintiff,

v.

DUKE UNIVERSITY HEALTH SYSTEM,  
INC.,

Defendant.

**JOINT MOTION FOR ENTRY OF  
CONSENT PROTECTIVE ORDER**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure and Local Civil Rule 7.1, the parties hereby move this Court for the entry of a consent protective order in this matter. The parties believe that discovery and the trial of the above-captioned action is likely to involve the production and disclosure of confidential, proprietary, or sensitive information requiring protection against unrestricted disclosure or use. The parties have agreed upon the form of the protective order, which is filed contemporaneously herewith.

WHEREFORE, the parties jointly seek the entry of a protective order to govern the disclosure or use of confidential, proprietary, or sensitive information.

Respectfully submitted this 27th day of September, 2022.

/s/ Joseph D. Budd

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*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing *Joint Motion for Entry of Consent Protective Order* was electronically filed with the Clerk of the Court using the CM/ECF system which will automatically send notice and serve same upon counsel of record via the Court's electronic case filing system.

This the 27th day of September, 2022.

/s/ Tory Ian Summey

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